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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MAR 29 1993

FCC MAIL ROOM

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Re: PR Docket 92-235

Dear Ms. Searcy:

As a member of a local agency providing emergency services to the public, I would respectfully like to submit comments on the "Refarming" proposal.

As a provider of fire and related emergency services in a largely rural area of central California, we operate over a relatively wide geographical area. Required reduction in power could, in many instances, reduce coverage below acceptable levels of performance for the day-to-day operation of our public safety agencies. Further, reduction in the allowable levels of modulation may degrade the signal-to-noise ratio, further reducing the effectiveness of our present system.

Based on the best information available to us, virtually none of our existing radio communication system could effectively be converted or modified to meet the new technical standards. Much of this equipment is relatively new, being purchased in the last five years. "Narrow banding" or reducing channel bandwidth will render even this, as well as older equipment, obsolete and non-usable.

Further purchase of equipment for replacement to meet new standards is virtually out of the question, given the fiscal situation currently facing local government in California. Funding is marginal for required maintenance on existing systems.

The California fire service, under the leadership of the Governors Office of Emergency Services, FIREScope project, has just completed a state wide fire mutual aid agreement. The basis for this agreement is a controlled sharing of VHF frequencies licensed to local, state and federal agencies. Authorization for shared use is controlled by the licensee and restricted by agreed upon guidelines. This agreement establishes a state wide mutual capability for the fire service, a service that makes daily use of mutual aid to meet its objectives. Any adverse impact to this system would be detrimental to our mission as well as a severe set back to public fire and life safety.

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The elimination of service block frequency allocations will complicate an already complex system of coordination. With the proliferation of communications system needs in the public sector, APCO and IMSA currently have a tremendous responsibility to manage specific blocks of spectrum. This would be adversely affected by removing or substantially altering the management system now in place.

The individual, not to mention cumulative effects, of "Refarming" could be disastrous to local government agencies. Make no mistake that funding is not now present, nor does it appear that it will be in the future, to substantially retrofit, modify, or replace current equipment operated by the local fire service agencies in California.

Please register my opposition, and that of my agency, to the "Refarming" proposal currently under consideration by the Federal Communications Commission.

Respectfully submitted,

Robert F. Silva

Robert F. Silva, Fire Chief

Hughson Fire Protection District

County of Stanislaus